Applicant: Wolrich, et al.

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REMARKS

The Examiner has rejected claim 1 as being unpatentable over Isfeld et al. (U.S. Pat. 5,592,622) in view of Chilton et al. (U.S. Pat. 6,418,488).

The Applicants and the Examiner continue to disagree regarding the teachings of Isfeld and Chilton. However, in this response, Applicants additionally assert that it would not have been obvious to combine Isfeld and Chilton.

A passage of Isfeld relied on by the Examiner in his rejection describes how one line card, "4", passes a packet to another line card, "5" (col. 8, line 50 - col. 9, line 15). Isfeld emphasizes that in this scheme "the input card simply sends the message to the output card. The sender does not need to allocate buffers or get permission from the receiver" (col. 9, lines 40-42). As described by Isfeld, this packet "push" paradigm (col. 9, lines 16-38) offers a number of important benefits including conservation of bus bandwidth.

The Examiner suggests combining Isfeld with Chilton. The passage of Chilton relied on by the Examiner describes how writing a command to a transmit frame (XmtFrm) register initiates transfer of an individual frame packet (col. 25, lines 1-59). Though the Examiner's proposed construction of the resulting combination is unclear, presumably, the Examiner suggests modifying line cards of Isfeld to include Chilton's transmit frame registers and to further modify them to transmit information in the registers to a modified receiving line card for each packet transmission. These additional data transmissions by the line cards, however, would not only consume considerable bus bandwidth but is also diametrically opposite Isfeld's scheme of transferring a packet without permission from the receiver. Additionally, it is not clear how such a combination would prevent accumulation of transfer errors as proposed by

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the Examiner. As such, it would not have been obvious to modify Isfeld based on Chilton. Thus, Applicants request allowance of claim 1.

For at least the same reasons, Applicants request allowance of claims 2-8. Applicants also request allowance of claims 9-17 for, at least, similar reasons. Applicants maintain their position regarding claims 18-32 and request allowance for reasons explained in the previous response.

If any fees are due, please apply such fees to Deposit Account No. 06-1050 referencing attorney docket number: 10559-128001.

Respectfully submitted,

Date: 12/1/03

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